

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(CENTRAL DIVISION)**

**In re:**

**WESTBOROUGH SPE LLC,  
  
Debtor.**

**Chapter 7  
Case No. 23-40709-CJP**

**STATEMENT OF FERRIS DEVELOPMENT GROUP, LLC IN SUPPORT OF MOTION OF  
CHAPTER 7 TRUSTEE FOR APPROVAL OF SETTLEMENT AGREEMENT**

NOW COMES Ferris Development Group, LLC (“Ferris Development”) and hereby submits this Statement in support of the Motion of Chapter 7 Trustee for Approval of Settlement Agreement [Dkt. 190] to Approve Settlement (the “Settlement Motion”). Ferris Development respectfully states as follows:

1. Ferris Development is a Massachusetts limited liability company with a principal place of business in Southborough, Massachusetts.

2. Ferris Development is in the business of developing and managing real estate projects.

3. Ferris Development hereby incorporates by reference the Affidavit of David M. Ferris, principal of Ferris Development, submitted herewith as if fully restated herein (the “Affidavit”).

4. As set forth in the Affidavit, Ferris Development at all times acted in good faith with respect to the matters described in the Settlement Motion. In the event that Ferris Development purchases the Premises pursuant to the terms set forth in the Settlement Motion, Ferris Development is entitled to the protections afforded to good faith purchasers under Section 363(m) of the Bankruptcy Code.

WHEREFORE, Ferris Development respectfully requests that this Court enter an Order:

- a. Approving the Settlement Motion;
- b. Finding Ferris Development to be a good faith purchaser entitled to the protections under Section 363(m) of the Bankruptcy Code; and
- c. Granting Ferris Development such further relief as is just.

Respectfully submitted,

FERRIS DEVELOPMENT GROUP, LLC

By its counsel,

/s/ Paul W. Carey

Paul W. Carey, BBO #566865  
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Dated: July 29, 2024

### **CERTIFICATE OF SERVICE**

I hereby certify that, on July 29, 2024, the foregoing Statement and accompanying Affidavit were filed with the United States Bankruptcy Court – District of Massachusetts and served upon all parties entitled to receive notice of filings in the above-captioned proceeding via the Bankruptcy Court's Electronic Case Filing (ECF) system and served via First Class Mail on:

Lolonyon Akouete  
800 Red Milles Rd.  
Wallkill, NY 12589

Denise Edwards  
137 North 25<sup>th</sup> Street  
Wyandanch, NY 11798

By: /s/ Paul W. Carey  
Paul W. Carey